

CLYDE & CO

US LLP

200 Campus Drive

Suite 300

Florham Park, New Jersey 07932

Telephone: 973 210 6700

Facsimile: 973 210 6701

www.clydeco.us

Patrick.During@clydeco.us

December 21, 2011

Via E-File

Clerk
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street Room 2020
Trenton, NJ 08608

**Re: Sandra Baptista v. Target Corporation
Civil Action No. 11-cv-6977 (AET)(LHG)**

Dear Sir/Madam:

Enclosed please find a Stipulation on Case Valuation and Consent Remand Order with regard to the above-referenced matter. Thank you.

Very truly yours,


PATRICK E. DURING

PED/vs

Enclosures

cc: John J. Sheptock, Esq.

CLYDE & CO US LLP

200 Campus Drive

Suite 300

Florham Park, NJ 07932

(973)-210-6700

Attorneys for Defendants, Target Corporation

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Sandra Baptista,

Plaintiff,

v.

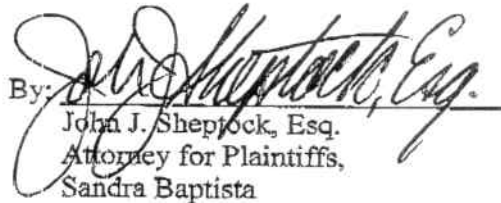
TARGET and JOHN DOE,

Defendants.

CIVIL ACTION NO. 11-cv-06979-AET-LHG

STIPULATION ON CASE VALUATION

Plaintiff, Sandra Baptista, hereby stipulates and agrees that any judgment entered in her favor will not exceed \$75,000.00, inclusive of attorneys' fees, costs and interest. In reliance upon plaintiff's statement of damages and plaintiff's counsel's representations on December 13, 2011 and this Stipulation, defendant, Target Corporation will submit a form of Consent Remand Order to the United States District Court for the District of New Jersey.

By: 
John J. Sheptock, Esq.
Attorney for Plaintiffs,
Sandra Baptista

Dated:

622850v1

CLYDE & CO US LLP

200 Campus Drive

Suite 300

Florham Park, New Jersey 07932

(973) 210-6700

Attorneys for Defendants, Target Corporation

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Sandra Baptista,

Plaintiff,

v.

TARGET and JOHN DOE,

Defendants.

CIVIL ACTION NO. 11-cv-06979-AET-LHG

CONSENT REMAND ORDER

THIS MATTER having come before the Court by Stipulation of John J. Sheptock, Esq., counsel for plaintiff, Sandra Baptista, and Matthew W. Bauer, Esq., of Clyde & Co US LLP, counsel for the defendant, Target Corporation, wherein plaintiff and defendant stipulate and agree that the above action is hereby remanded to the Superior Court of New Jersey, Law Division, Somerset County, for all further proceedings as diversity jurisdiction no longer exists pursuant to plaintiff having stipulated that any judgment entered in her favor will not exceed \$75,000.00, inclusive of attorneys' fees, costs and interest.

IT IS on this _____ day of _____, 2011,

ORDERED that, this matter is hereby remanded to the Superior Court of New Jersey, Law Division, Somerset County; and it is further

ORDERED that a copy of this Order be served upon all attorneys of record within seven (7) days of its receipt by counsel.

622849v1

AGREED AND ACCEPTED:

JOHN J. SHEPTOCK, LLC.
Attorneys for Plaintiff,
Sandra Baptista

By: 
John J. Sheptock, Esq.

Dated:

CLYDE & CO US LLP
Attorneys for Defendants,
Target Corporation and

By: 
Matthew W. Bauer, Esq.

Dated:

SO ORDERED:

Honorable Anne E. Thompson, U.S.D.J.

Dated: